

JAP:MPC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

ROSMERY PERALTA NUNEZ,

Defendant.

PRE-ARRAIGNMENT  
C O M P L A I N T  
(21 U.S.C. §§ 952  
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

VINCENT MARINO, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 28, 2012, within the Eastern District of New York and elsewhere, defendant ROSMERY PERALTA NUNEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On January 28, 2012, the defendant (the "defendant") ROSMERY PERALTA NUMEZ, arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 840 from Santiago, Dominican Republic.

2. The defendant was selected for a routine examination. During an examination, and subsequent pat-down, officers discovered that the defendant had vaginally inserted a foreign object of what appeared to be a white powdery substance. The substance field tested positive for cocaine. Additionally the defendant admitted to ingesting pellets containing cocaine.

3. The defendant was transported to JFK medical facility where an X-ray was taken that revealed the presence of foreign bodies in the defendant's digestive tract.

4. The defendant also admitted to agents that she knew she was importing illegal narcotics and that she was to be paid \$8,000 for smuggling drugs into the United States.

4. On January 28, 2012, at approximately 11:00 a.m., the defendant passed forty (40) pellets, which field-tested positive for the presence of cocaine.

5. As of January 30, 2012 at 8:00 a.m., the defendant had passed approximately forty-nine (49) pellets in total.

6. The defendant will be detained at the JFK medical facility until such time as he has passed all the pellets

contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant, ROSMERY PERALTA NUNEZ, be dealt with according to law.



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Jack Lee VINCENT MARINO  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
30th day of January, 2012

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